

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 15-13631

Honorable: George Caram Steeh

vs.

EIGHT THOUSAND FIVE HUNDRED
TWENTY-SIX DOLLARS AND
FIFTY-THREE CENTS (\$8,526.53) IN
U.S. CURRENCY FROM COMERICA
BANK ACCOUNT #1852550712; AND
ONE (1) 2011 MERCEDES-BENZ, GL 450,
VIN: 4JGBF7BE7BA688242,

Defendants *In Rem*.

**STIPULATION FOR ENTRY OF ORDER STAYING
CIVIL FORFEITURE PROCEEDING**

Plaintiff, the United States of America, and Claimant, Mark Sitto, by and through their undersigned attorneys, hereby acknowledge that there is an ongoing criminal investigation involving Claimant that is related to this civil forfeiture case. Therefore:

IT IS HEREBY STIPULATED AND AGREED that this civil forfeiture case be stayed pursuant to 18 U.S.C. §981(g)(1), or alternatively, 18 U.S.C. §981(g)(2), on the grounds that continuation of the civil proceeding may negatively impact one or all parties in the manner described in the cited statutes. The parties agree that the stay continue during the pendency of the investigation and related criminal proceedings, or until further order of the Court without prejudice to any of the parties to seek an advance termination or an extension of the stay.

IT IS FURTHER STIPULATED AND AGREED that upon termination of the stay, both parties shall be afforded a reasonable time to file witness lists, conduct discovery, and file dispositive motions prior to any pretrial or trial proceedings. No claims or defenses are waived as a result of the stay.

IT IS FURTHER STIPULATED AND AGREED that upon termination of the stay, the Court will set a new scheduling conference to take place. The parties shall give the court a status report in six months (on or before June 9, 2016).

Respectfully submitted,

BARBARA L. McQUADE
United States Attorney

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S/TODD FLOOD (with consent)
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(P-58555)

Dated: December 9, 2015

Dated: December 9, 2015

IT IS SO ORDERED:

Dated: December 9, 2015

s/George Caram Steeh
HONORABLE GEORGE CARAM STEEH
United States District Judge